

# UNDERWOOD

ROGER S. COX  
Direct: 806.242.9651  
roger.cox@uwlaw.com

www.uwlaw.com

November 14, 2018

Kenneth Netardus, Esq.  
Stockard, Johnston & Brown P.C.  
1800 S. Washington, Suite 115  
Amarillo, Texas 79102

Re: Civil Action No. 2:15-cv-00288-J  
*AgTexas, PCA v Robbie James Bullock and Carrie Jean Bullock*

Dear Kenneth:


As you will recall, on June 29, 2018, I served you with the Plaintiff's Second Set of Interrogatories in Aid of Judgment to Robbie James Bullock. Unfortunately, Mr. Bullock has not responded to those Interrogatories.

As you know, the Federal Rules applicable to discovery apply to post-judgment discovery as well. Mr. Bullock is required to respond to the Interrogatories. Failure to comply with discovery requests can result in sanctions, and in the case of a post-judgment situation, other orders compelling compliance.

There are no forbearance agreements or the like presently in place, so AgTexas is free to take any steps necessary to enforce the judgment (and compliance with Mr. Bullock's discovery requirements). As a practical matter, however, this may present one last opportunity for Mr. Bullock to comply with the discovery requests. I will plan to check in with you Monday, November 19, 2018. Again, please note that AgTexas is free to seek appropriate enforcement actions with respect to the underlying judgment.

This letter presupposes that you still represent the Bullocks, and we have seen no writings to the contrary. That said, we will continue to correspond with you regarding efforts to obtain Mr. Bullock's discovery responses.

Respectfully,



Roger S. Cox

Enclosure: Plaintiff's Second Set of Interrogatories in Aid of Judgment (additional copy); copy of forwarding email of June 29, 2018.

---

UNDERWOOD LAW FIRM, P.C.

AMARILLO AUSTIN FORT WORTH LUBBOCK PAMPA